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Infowars, LLC and Free Speech Systems, LLC*

**IN THE UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

MATT FURIE,

Plaintiff,

vs.

INFOWARS, LLC; FREE SPEECH
SYSTEMS, LLC,

Defendants.

Case No. 2:18-cv-01830-MWF-JPR

**APPLICATION FOR LEAVE TO
FILE UNREDACTED VERSIONS
OF DEFENDANTS' MOTION
FOR SUMMARY JUDGMENT
AND SUPPORTING
DOCUMENTS UNDER SEAL**

Hon. Michael W. Fitzgerald

Case Filed: March 5, 2018

Trial Date: July 16, 2019

Pursuant to L.R. 79-5.2.2, Defendants Free Speech Systems, LLC (“FSS”) and Infowars, LLC (“Infowars”) file their application for leave to file unredacted versions of their concurrently-filed Motion for Summary Judgment (the “Motion”) and supporting documents under seal. Defendants’ Motion, as well as the supporting Statement of Uncontroverted Facts and Conclusions of Law and exhibits thereto, make reference to multiple documents designated as Confidential pursuant to the Protective Order on file in this case (Doc. No. 62). Specifically, these documents are licensing agreements Plaintiff Matt Furie entered into with third parties regarding use of the Pepe the Frog character, and certain portions of the deposition of Mr. Furie referring to certain contents of these agreements.

On April 5, 2019, counsel for the parties conferred regarding the necessity of filing these designated documents under seal, or if redactions would be appropriate. Counsel for Plaintiff stated that these documents did not need to be filed under seal in their entirety and identified portions of these documents to be redacted. Under L.R. 79-5.2.2(a)-(b), a supporting declaration of counsel for Defendants is attached identifying the redacted documents and efforts made to resolve the issues of redaction and sealing.

1 Dated: April 8, 2019

Respectfully submitted,

2 RANDAZZA LEGAL GROUP, PLLC

3 /s/ Alex J. Shepard

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7 *Attorneys for Defendants,*

8 *Infowars, LLC and*

9 *Free Speech Systems, LLC*

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 8, 2019, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I further certify that a true and correct copy of the foregoing document is being served via transmission of Notice of Electronic Filing generated by CM/ECF.

Respectfully submitted,

/s/ Alex J. Shepard

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